

REMARKS

I. General Matters

Applicants submitted an *Information Disclosure Statement* with an accompanying PTO/SB/08 form, on September 28, 2005. However, the Examiner has not acknowledged receipt of this *Information Disclosure Statement*, nor returned an initialed copy of the PTO/SB/08 form. Applicants respectfully request that the Examiner do so in the next Office Action.

Applicants thank the Examiner for withdrawing the 35 U.S.C. § 101 rejection of record in the June 28, 2005 *Office Action*.

II. Status of the Application

Claims 1-27 are all the claims pending in the Application. Claims 1-12 stand rejected.

III. Obviousness Rejection

The Examiner has rejected claims 1-27 under 35 U.S.C. § 103(a) as being unpatentable over *Janssen et al.* (US 6,512,529; hereinafter “*Janssen*”) in view of *DeStefano* (US 6,304,259; hereinafter “*DeStefano*”) and *Berman et al.* (US 6,448,956; hereinafter “*Berman*”). This rejection is respectfully traversed.

III(A). The Applied References Fail To Teach Or Suggest Independent Claim 1’s Recitation of Presenting Second Screen Information On Different Display Apparatuses

Applicants respectfully submit that the applied references fail to teach or suggest independent claim 1’s recitation of “presenting second screen information on both a second contracted display window of the plurality of contracted display windows and a second display apparatus.”

As a matter of background, in the June 28, 2005 *Office Action* (p. 5), the Examiner conceded that both *Janssen* and *DeStefano* fail to teach or suggest “presenting the same screen information on both a second contracted display window and another display apparatus.” Thus, in an effort to show that these features were somehow known, the Examiner alleged that *Berman* discloses such features in column 8, lines 39-56 thereof.

However, Applicants pointed out in the September 28, 2005 *Amendment* that even when the use of multiple display monitors are disclosed by *Berman* (see FIGS. 3A-3C), these multiple display monitors are specifically provided to display different images on each display (*i.e.*, FIG. 3B shows images A-D on display 10A and images E-H on display 10B), and not the same image on different displays. Thus, Applicants submitted that no combination of *Janssen*, *DeStefano* and *Berman* could teach or suggest the recited features.

In the instant *Office Action*, the Examiner seems to agree with the Applicants’ reading of *Berman* as providing different images on each display, as he withdraws his allegation that *Berman* discloses “presenting the same screen information on both a second contracted display window and another display apparatus.” Instead, the Examiner now alleges that *Janssen* somehow discloses these features (in direct contrast to his explicit statement in the June 28, 2005 Office Action cited above). Specifically, the Examiner now vaguely alleges that *Janssen* discloses, in its “Background” section (see *O.A.*, p. 6), that:

[w]indows on the desktop can be organized in a variety of different ways including the tiled windows so that the contents of each window are totally visible to the operator ... [Janssen] taught more advanced technique of invisible windows for the overlapped windows to solve the problem of the limited screen space. However, [Janssen] also teaches the tiled windows of a larger screen surface of multiple screen surfaces; see column 2, lines 1-10.

Applicants respectfully disagree with the Examiner's assertion that the "Background" section of *Janssen* is in any way relevant to the recited features of independent claim discussed above. Rather, while the "Background" section of *Janssen* indicates that generic windows can be tiled, overlapped, or stacked and these windows can be managed by standard window manipulation techniques (col. 1, lines 21-25 and 30-36), it specifies but that "it is too cumbersome and time consuming to use [such] standard window manipulation techniques" when using the systems to which *Janssen* is directed (e.g., the control system of FIG. 2) (col. 2, lines 3-5). Further, while *Janssen* indicates that one possible solution to this problem is to provide "multiple screen surfaces to provide enough space to display all of the required data," it concedes that this solution is also undesirable because of the necessary room and expense (col. 2, lines 6-12) and is simply silent regarding just how information is to be displayed on these "multiple screen surfaces." Accordingly, *Janssen* indicates that it is directed to a "method of designating windows as invisible so that information in background windows is not obscured" (col. 2, lines 25-28), such as is shown in FIGS. 3 and 4.

In view of the above, Applicants respectfully submit that, while *Janssen* does disclose the possible use of "multiple screen surfaces," it is simply silent regarding just what data is specifically shown on such "multiple screen surfaces." Thus, Applicants respectfully submit that *Janssen* cannot reasonably be read as teaching or suggesting anything regarding whether the same screen information is displayed on different ones of the multiple screen surfaces.

Further, Applicants respectfully submit that the alleged provision of the same screen information on multiple screen surfaces would be completely contrary to the entire purpose of

Janssen, which is to present a great deal of information to a user in a format allowing the user to view the information in as an efficient manner as possible. In contrast to this purpose, the alleged provision of the same information on multiple screens would: (1) be redundant; and (2) would take up display space that could be used for other information.

Lastly, *Janssen* specifically indicates that the prior art display methods are insufficient, and therefore is directed to providing “invisible” windows. Thus, one of skill would not have been motivated to modify *Janssen* by returning to the insufficient prior art display methods of the “Background” section (*i.e.*, the standard window manipulation or multiple screen surface techniques).

III(B). One Of Ordinary Skill In The Art Would Not Have Modified Janssen In View Of DeStefano To Arrive At The Features Of Independent Claim 1

Regarding independent claim 1’s recitation of “presenting first screen information on both a first contracted display window of the plurality of contracted display windows and the main display window,” the Examiner concedes that *Janssen* fails to disclose such features (*O.A.*, p. 8). Applicants agree that *Janssen* is deficient in at least this regard.

However, in an attempt to show that such features were known, the Examiner cites FIG. 23 of *DeStefano*, and alleges that (*O.A.*, pp. 8 and 9):

[i]t would have been obvious to have incorporated [*DeStefano*’s] system to relate the first screen information for the plurality of different windows in the multiple windowing apparatus of [*Janssen*] because [*Janssen*] suggests providing multiple screen surfaces to provide enough space to display all of the required data and one window may contain a geographic view of the airspace in which aircraft are plotted on the display according to their current position based on radar reports and another window may have a dynamically changing table summarizing details about each aircraft including information such as current speed and altitude; *Janssen* column 1-3) and therefore suggesting the claim

limitation of displaying the same altitude information about an aircraft on the multiple windows.

Applicants respectfully disagree with the Examiner's interpretation of *Janssen*. While *Janssen* does disclose two windows that respectively display an aircraft's "current position based on radar reports," and the aircraft's "current speed and altitude ... based on radar reports" (col. 1, lines 44-50), Applicants respectfully submit that there is no teaching or suggestion that the two windows display the same information. In fact, *Janssen* specifically indicates that different information (*i.e.*, current position vs. current speed/altitude) is displayed in the two windows. Position, speed and altitude are all different information, not the same as the Examiner alleges.

Further, Applicants respectfully submit that the provision of duplicate information in different windows in one display in *Janssen* (either in view of *Janssen* itself or in view of *DeStefano*) would be completely contrary to its entire purpose. Rather, as discussed above, *Janssen* is directed to presenting a great deal of information to a user in a format allowing the user to view the information in as an efficient manner as possible. The provision of duplicate information on multiple windows of one screen would: (1) be redundant; and (2) would take up display space that could be used for other information.

III(C). The Applied References Fail To Teach Or Suggest Independent Claim 1's Recitation of Changing The Second Contracted Display Window And The Second Display Apparatus To Present The Third Screen Information Thereon

Applicants respectfully submit that the applied references fail to teach or suggest independent claim 1's recitation of "changing the second contracted display window and the second display apparatus to present the third screen information thereon in response to an operation to the information processing apparatus."

The Examiner concedes that both *Janssen* and *DeStefano* fail to teach or suggest these features. Applicants agree that *Janssen* and *DeStefano* are deficient in at least this regard. However, in an attempt to show that such features were known, the Examiner cites *Berman*, and alleges that it discloses (*O.A.*, pp. 10 and 11):

changing the second contracted display window and the second display apparatus to present the third screen information thereon in response to an operation to the information processing apparatus (using the drag and drop function to drag display information for one window to another window on the same display or on a different display; see [*Berman*] column 10, lines 39-67 and column 1-25; column 15-17).

Applicants respectfully disagree. As discussed in Applicants' previous response, the "drag and drop" operation disclosed in *Berman* (see col. 8, lines 28-48; emphasis added):

allows the user to invoke a "grabbing hand" cursor 23, as shown in FIG. 12, to ... "drag and drop" individual images in the page display mode, or stacks of images in the stack display mode. Once the cursor 20 of FIG. 4 changes form, the user may engage it with a persistent click of the left mouse button 321, and virtually pick up and move the active image, or stack of images, unto another location on the image display monitor 10 ... [Further, as] shown in FIG. 2A ... [the] "drag and drop" function allows the image or stack of images in image display window A, for example, to be interchanged with the image or stack of images in image display window D. This feature is especially useful for grouping images or placing images side-by-side for comparison purposes.

Thus, as previously pointed out, it is clear that the "drag and drop" operation is directed to the manipulation of an image arrangement on a single display 10 (see FIG. 2A). *Berman* fails to mention any corresponding display of any of the images subject to the "drag and drop" operation on any other "display apparatus" than display 10.

In other words, if the "drag and drop" functionality were used to move the image "B" to where image "A" is displayed in the monitor 10A of the two monitor arrangement of FIG. 3B of

Berman, there is no teaching or suggestion that any of the images E-H on monitor 10B would be changed in any respect to also display the image “B.”

The Examiner also alleges that a different part of *Berman* is somehow relevant to these claimed features in the “Response to Arguments” section of the instant *Office Action*, by alleging that *Berman* somehow discloses (*O.A.*, pp. 3-4):

in column 10, line 39 through column 11, line 2, using the drag and drop image manipulation to rearrange the images A-D displayed in [a] two-monitor device ... [and] ... in column 14, lines 1-25, performing one of a plurality of image manipulation functions associated with each of the regions within the activated image window and executing a selected one of the image manipulation functions within the activated the drag and drop image display window wherein the images or image regions are displayed in a plurality of display monitors as shown in Figs. 3A-11C.

Applicants respectfully disagree. With respect to col. 10, line 39 - col. 11, line 2, Applicants again note that *Berman* does not disclose any particular image on two different displays. Rather, as shown in FIG. 5 (which is discussed in the cited section), images A-D are initially displayed on monitor 1, while images E-H are initially displayed on monitor 2. Then, “by placing the cursor 20 in the left or right 20% border regions of any image and clicking the left mouse button 321, the system will replace the images on both monitors starting with the next undisplayed image.” Thus, as shown in FIG. 5, after a mouse click, images I-L are displayed on monitor 1 and images M-P are displayed on monitor 2. Thus, at no time in this embodiment is there any displaying of any one image on multiple monitors.

Further, with respect to col. 14, lines 1-25, this portion of *Berman* also fails to disclose any particular image on two different displays. Rather, this portion discloses the provision of “a plurality of digital images” on “a number of windows 1 to n,” and that, by enabling a synch flag, that a function (e.g., level, magnification, stacking) may affect multiple windows at once (see

also col. 9, lines 35-44). However, while *Berman* indicates that a function may affect multiple windows at once, there is no teaching or suggestion that the same information is displayed on any two windows. Thus, no matter what function is performed on any one window or plurality of windows, the result of that function will not be that a single image (or “screen information”) is displayed in multiple windows, or multiple monitors.

III(D) The Applied References Fail To Teach Or Suggest Independent Claim 1’s Recitation of Non-Overlapping Windows

Applicants respectfully submit that the applied references (either alone or in combination) fail to teach or suggest independent claim 1’s recitation of “partitioning the screen of a first display apparatus into a main display window and a plurality of contracted display windows in a manner such that the windows do not overlap each other.” Rather, *Janssen* specifically discloses (and is specifically directed to) a system for providing overlapping windows 7, 10 (see FIGS. 2-5), *DeStefano* discloses overlapping lenses 420 and 422 in FIG. 18, and *Berman* discloses images that are all of the same size.

Applicants have previously pointed out these differences in the September 28, 2005 *Amendment* by disagreeing with the Examiner’s allegation in the June 28, 2005 *Office Action* that the windows disclosed in *Janssen*’s FIGS. 2-4 “do not overlap each other.” Rather, Applicants pointed out that all of the FIGS. 2-4 cited by the Examiner show “overlapping user interface windows” 7, 10 arranged above radar data 8. Both the name of these elements (*i.e.*, “overlapping”) and the illustrations of their arrangement (*i.e.*, over radar data 8) show that, rather than not overlapping, these windows 7, 10 are specifically designed to overlap radar data 8.

Indeed, it is the entire purpose of *Janssen* to provide these windows 7, 10, with an “invisible window feature” above radar data 8 in an overlapping fashion. In fact, if there was no

such overlapping, there would be no need for the invention of *Janssen*, i.e., the “invisible window feature.” Further, with respect to the “invisible” windows shown in Figures 3 and 4, Applicants respectfully submit that, even when the windows are “invisible,” they are still arranged above radar data 8.

In the instant *Office Action*, the Examiner seems to concede that Applicants’ interpretation of FIGS. 2-4 of *Janssen* is correct, as the Examiner alleges that a new basis of rejection can somehow be found in the “Background” section of *Janssen*, rather than the previously cited FIGS. 2-4 of that reference. Specifically, the Examiner alleges (see pp. 2 and 3 of the *Office Action*):

[(1) that *Janssen* discloses] in the Background of the Invention that the windows on the desktop can be organized in a variety of different ways including the tiled windows so that the contents of each window are totally visible to the operator... [and a] more advanced technique of invisible windows for the overlapped windows to solve the problem of the limited screen space[; and]

[(2) that although *Janssen*] focuses on the invisible windows of the overlapped windows, [*Janssen*] aims to solve the prior art problems of the limited screen space for presenting large pieces of information using the multiple windows. This does not preclude [*Janssen*] from teaching non-overlapped windows since tiled windows are non-overlapped and overlapped windows can be moved and resized so that they are not overlapped.

Regarding the Examiner’s allegation (1), as noted above, *Janssen* does disclose that windows “can be tiled so the contents of each window are totally visible to the operator, ... can be overlapped so that the contents of a window partially overlays another window, or ... can be stacked so that one window completely overlays another window” (col. 1, lines 21-25). Further, *Janssen* discloses that these windows can be managed by standard window manipulation

techniques, such as by making these windows larger or smaller, or moving them to a different position (col. 1, lines 30-36).

However, contrary to the Examiner's allegation (2) that *Janssen*'s invisible windows do "not preclude [*Janssen*] from teaching non-overlapped windows," it has long been held that a "prior art reference must be considered in its entirety, *i.e.*, as a whole, including portions that would lead away from the claimed invention." *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). MPEP 2141.02 (VI). In this instance, *Janssen* specifically indicates that "it is too cumbersome and time consuming to use standard window manipulation techniques such as resizing or moving windows" when using systems such as are shown in *Janssen*'s FIG. 2 (col. 2, lines 3-5). Thus, to overcome this problem, *Janssen* indicates that its entire purpose is to provide a "method of designating windows as invisible so that information in background windows is not obscured" (col. 2, lines 25-28), such as is shown in FIGS. 2-4.

Thus, one of ordinary skill in the art at the time of the invention ("one of skill") would not have been motivated to modify *Janssen* to provide non-overlapping windows, as such a modification: (1) is expressly indicated as being too cumbersome to use; and (2) would completely change the operation of *Janssen*'s invention.¹

¹ If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959) MPEP § 2143.01

III(E). The Applied References Fail To Teach Or Suggest The Features of Dependent Claims 2-4 and 13-16

Applicants respectfully submit that rejected dependent claims 2-4 and 13-16 are: (1) allowable by virtue of their dependency; and (2) separately patentable over the applied references.

For example, Applicants respectfully submit that the applied references fail to teach or suggest dependent claim: (1) 13's recitation that the "main display window encompasses a majority of the display apparatus;" (2) 14's recitation that the "second and third contracted display windows are the same size;" and (3) 15's recitation that the "second and third contracted display windows are arranged along the periphery of the main display window."

The Examiner disagrees, and alleges that *Janssen* discloses these features in column 1, lines 19-25 and 55-65; and column 2, lines 1-15 (*O.A.*, p. 12).

Applicants respectfully disagree, and submit that the portion of *Janssen* cited by the Examiner fails to teach or suggest any particular size or shape of a "main display window." In fact, the only illustrations that shows different window sizes in *Janssen* are those of FIGS. 2-5, upon which the Examiner specifically no longer relies (as these fail to teach or suggest a "tiled" window arrangement).

Further, Applicants respectfully submit that the applied references fail to teach or suggest dependent claim 16's recitation that "when the second information is displayed on both a second contracted display window and a second display apparatus, the second contracted display window and a second display apparatus display only the same information, in different scales."

The Examiner disagrees, and alleges that *Janssen* and *Berman* "disclose displaying screen information on multiple screen surfaces ([*Janssen*] column 2, lines 1-15 and [*Berman*]

column 10, lines 39-67) and thus the same screen information is displayed on both the second contracted display window of the first screen surface and a second screen surface. Since the sizes of the multiple screen surfaces are different, the screen information [is] displayed in different scales in view of the inherent nature of the display resolutions associated with the different display devices ([*Janssen*] column 2, lines 1-15 and [*Berman*] column 10, lines 39-67)."

Applicants respectfully disagree. First, there is no specific teaching or suggestion in either *Janssen* or *Berman* that any screen information is provided in different scales on multiple screen surfaces. Rather, *Janssen* is silent regarding any particular information stored on multiple screens (as discussed above), and *Berman* specifically discloses that all of its multiple screens provide screen information that is the same size (see, e.g., FIGS. 5, 6A and 6B).

III(F). Independent Claims 5, 9 and 25-27 and Dependent Claims 6-8, 10-12 and 17-24

Regarding independent claims 5, 9 and 25-27, Applicants respectfully submit that these claims are patentable for reasons similar to those discussed above with respect to independent claim 1. Further, Applicants respectfully submit that rejected dependent claims 6-8, 10-12 and 17-24 are: (1) allowable by virtue of their dependency; and (2) separately patentable for at least the reasons discussed above with respect to dependent claims 2-4 and 13-16.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-27 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-27.

Response Under 37 C.F.R. § 1.116
U.S. Application No. 10/763,160

Attorney Docket No. Q79567

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,



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